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OCMBC, INC. dba
7 LOANSTREAM MORTGAGE

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UNITED STATES DISTRICT COURT

10 CENTRAL DISTRICT OF CALIFORNIA – SOUTHERN DIVISION

11

12 KIMBERLY HUDSON-BRYANT,
13 individually and on behalf of all others
similarly situated,

14

Plaintiffs.

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V.

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17 SUE M. HARRIS, PRESTON L. HARRIS,
18 PREMIER FINANCIAL MARKETING
LLC D/B/A RESMO LENDING, AND
SEAN ROBERTS

Defendants.

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Case No. 8:24-cv-00067-FWS-JDE

**DECLARATION OF THOMAS F.
LANDERS IN SUPPORT OF JOINT
MOTION AND STIPULATION TO
CONTINUE CASE DEADLINES**

Judge: Hon. Fred W. Slaughter

Magistrate: Hon. John D. Early

Action Filed: January 11, 2024

Trial Date: TBD

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1 I, Thomas F. Landers, declare:

2 1. I am an attorney at law licensed to practice before all federal and state
3 courts in the State of California and am a partner with Solomon Ward Seidenwurm &
4 Smith, LLP (“SWSS”), counsel for Defendant OCMBC, INC. dba LOANSTREAM
5 MORTGAGE (“LoanStream”) in this action. I have personal knowledge of the facts
6 set forth in this declaration and I submit this declaration in support of the Parties’ Joint
7 Motion and Stipulation to Continue Case Deadlines (“Stipulation”).

8 2. Plaintiff filed a class action complaint on or about January 1, 2024.

9 3. After conducting certain discovery, on September 10, 2024, Plaintiff
10 filed a first amended complaint (“FAC”) and named two additional defendants. (ECF
11 No. 37).

12 4. On October 24, 2024, the Court issued a revised scheduling order
13 (“Scheduling Order”). (ECF No. 48).

14 5. On April 28, 2025, the Court issued its Order re Joint Motion and
15 Stipulation to Continue Case Deadlines (“Revised Scheduling Order”) (ECF No. 50).

16 6. On June 25, 2025, the Court issued its modified Order Re Joint Motion
17 and Stipulation to Continue Case Deadlines (ECF No. 52). The primary reason for
18 that continuance was because a key witness had been involved in a traffic accident
19 that resulted in her unavailability.

20 7. On September 25, 2025 the Court issued another modified Order Re
21 Joint Motion and Stipulation to Continue Case Deadlines, which further continued the
22 trial date and related ligation deadlines (ECF No. 55). The reason for this continuance
23 was the key witness’ ongoing unavailability, plus the Plaintiff became unavailable
24 due to the hospitalization of her husband and her status as his primary caregiver.

25 8. The Court issued the above orders due to witness and party health
26 related scheduling issues that prevented the scheduling of certain depositions,
27 including Plaintiff and LoanStream’s Rule 30(b)(6) witness. Those issues still exist.
28 LoanStream’s 30(b)(6) designee remains unavailable. As further described in the

1 accompanying declaration of Andrew R. Perrong, Plaintiff has been unavailable to
2 participate in the case.

3 9. The Parties have meet and conferred in good faith and have agreed to the
4 following deposition schedule:

- deposition of Plaintiff on February 17, 2026; and
 - deposition of LoanStream 30(b)(6) designee on February 24, 2026

8 10. For the reasons set forth herein, and to conserve time and judicial
9 resources, the Parties believe that a 60-day extension of all deadlines will allow the
10 Parties to properly complete discovery and prepare for trial.

11 I declare under penalty of perjury under the laws of the State of California that
12 the foregoing is true and correct, and that this declaration was executed on January 6,
13 2026, at San Diego, California.

/s/ Thomas F. Landers
Thomas F. Landers, Esq.